

EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

R&K
TPH-BTEX

W.D. Heath A #3A
Meter/Line ID - 93216

SITE DETAILS

Legals - Twn: 29N
NMOCD Hazard Ranking: 10
Operator: Amoco

Rng: 9W

Sec: 17 Unit: C
Land Type: BLM
Pit Closure Date: 05/16/94

RATIONALE FOR RISK-BASED CLOSURE

The pit noted above was assessed and ranked according to the criteria in the New Mexico Oil Conservation Division's (NMOCD) Unlined Surface Impoundment Closure Guidelines.

A Phase I excavation was conducted on May 16, 1994, to 12 feet below ground surface and a soil sample was collected for field headspace analysis and laboratory analysis for benzene, total BTEX, and TPH. Groundwater was not encountered in the test pit. Approximately 90 cubic yards of excavated material was removed for landfarming and sent to an OCD approved centralized site. The pit was backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 240 ppm; laboratory analysis indicated a benzene concentration of <0.5 mg/kg, a total BTEX concentration of 56 mg/kg, and a TPH concentration of 1010 mg/kg. TPH and total BTEX were above required remediation levels for the Hazard Ranking Score.

On June 23, 1995, a Phase II borehole was conducted to 30.5 feet below ground surface where bedrock was encountered. Groundwater was not encountered in the borehole. The borehole was grouted to the surface in a manner to direct surface runoff away from the pit area.

El Paso Field Services Company (EPFS) requests closure of the above mentioned production pit location for the following reasons:

- The primary source, discharge to the pit, has been removed for over six years.
- The pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- Groundwater was not encountered in the excavations or borehole.
- Residual hydrocarbons in the soil will degrade naturally with minimal risk to the environment.
- Bedrock was encountered at 30.5 feet below ground surface; consequently, impact to groundwater is unlikely.
- Excavated material has been removed from the pit eliminating potential direct contact with livestock and the public.
- There are no water supply wells or other sources of fresh water extraction within 1,000 feet of the site.
- The pit was excavated to the practical extent of the equipment, according to EPNG's pit closure plan.

FIELD PIT SITE ASSESSMENT FORM

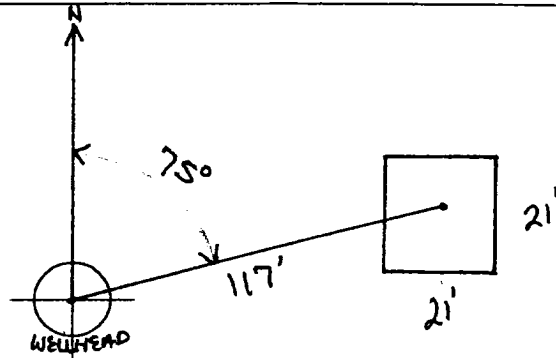
GENERAL	Meter: <u>93216</u> Location: <u>W.D. HEATH #3A</u> Operator #: <u>0203</u> Operator Name: <u>AMOCO</u> P/L District: <u>BLOOMFIELD</u> Coordinates: Letter: <u>C</u> Section <u>17</u> Township: <u>29</u> Range: <u>9</u> Or Latitude _____ Longitude _____ Pit Type: Dehydrator <input checked="" type="checkbox"/> Location Drip: _____ Line Drip: _____ Other: _____ Site Assessment Date: <u>5-7-94</u> Area: <u>10</u> Run: <u>53</u>								
SITE ASSESSMENT	NMOCD Zone: (From NMOCD Maps)								
	Land Type: <table border="0"> <tr> <td>BLM</td> <td><input checked="" type="checkbox"/> (1)</td> </tr> <tr> <td>State</td> <td><input type="checkbox"/> (2)</td> </tr> <tr> <td>Fee</td> <td><input type="checkbox"/> (3)</td> </tr> <tr> <td>Indian</td> <td>_____</td> </tr> </table>		BLM	<input checked="" type="checkbox"/> (1)	State	<input type="checkbox"/> (2)	Fee	<input type="checkbox"/> (3)	Indian
BLM	<input checked="" type="checkbox"/> (1)								
State	<input type="checkbox"/> (2)								
Fee	<input type="checkbox"/> (3)								
Indian	_____								
REMARKS	Depth to Groundwater Less Than 50 Feet (20 points) <input type="checkbox"/> (1) 50 Ft to 99 Ft (10 points) <input checked="" type="checkbox"/> (2) Greater Than 100 Ft (0 points) <input type="checkbox"/> (3)								
	Wellhead Protection Area : Is it less than 1000 ft from wells, springs, or other sources of fresh water extraction? , or ; Is it less than 200 ft from a private domestic water source? <input type="checkbox"/> (1) YES (20 points) <input checked="" type="checkbox"/> (2) NO (0 points)								
Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) <input type="checkbox"/> (1) 200 Ft to 1000 Ft (10 points) <input type="checkbox"/> (2) Greater Than 1000 Ft (0 points) <input checked="" type="checkbox"/> (3)									
Name of Surface Water Body _____ (Surface Water Body : Perennial Rivers, Major Wash, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds) Distance to Nearest Ephemeral Stream <input type="checkbox"/> (1) < 100' (Navajo Pits Only) <input type="checkbox"/> (2) > 100'									
TOTAL HAZARD RANKING SCORE: <u>10</u> POINTS									
Remarks : <u>TWO PITS ON LOCATION WILL CLOSE ONLY ONE. PIT IS DRY.</u> <u>LOCATION IS ON A HILL ABOVE SAN JUAN RIVER. REDLINE AND TOPO</u> <u>CONFIRMED LOCATION TO BE INSIDE THE V.Z.</u>									

DIG & HAUL

ORIGINAL PIT LOCATION

ORIGINAL PIT LOCATION

Original Pit : a) Degrees from North 75° Footage from Wellhead 117'
b) Length : 21' Width : 21' Depth : 5'



REMARKS

Remarks :

TOOK PICTURES AT
END DUMP

Completed By:

Pat Chapman
Signature

5.7.94
Date

GENERAL	Meter: <u>93216</u> Location: <u>W.D. HEATH A #3A</u> Coordinates: Letter: <u>C</u> Section <u>17</u> Township: <u>29</u> Range: <u>9</u> Or Latitude _____ Longitude _____ Date Started : <u>5-16-94</u> Area: <u>10</u> Run: <u>53</u>
FIELD OBSERVATIONS	Sample Number(s): <u>K.P #53</u> Sample Depth: <u>12'</u> Feet Final PID Reading <u>240</u> PID Reading Depth <u>12'</u> Feet Yes No Groundwater Encountered <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (2) Approximate Depth _____ Feet
CLOSURE	Remediation Method : Excavation <input checked="" type="checkbox"/> (1) Approx. Cubic Yards <u>90</u> Onsite Bioremediation <input type="checkbox"/> (2) Backfill Pit Without Excavation <input type="checkbox"/> (3) Soil Disposition: Envirotech <input type="checkbox"/> (1) <input checked="" type="checkbox"/> (3) Tierra Other Facility <input type="checkbox"/> (2) Name: _____ Pit Closure Date: <u>5-16-94</u> Pit Closed By: <u>B.E.I</u>
REMARKS	Remarks : <u>SOME LINE MARKER ON LOCATION. SOIL DARK BROWN</u> <u>WITH A SMELL. DUG A TEST HOLE. PID 246. DUG DOWN</u> <u>12' SOIL STILL DARK BROWN. WITH A SMELL. PID 240.</u> Signature of Specialist: <u>Kelly Padilla</u>



FIELD SERVICES LABORATORY
ANALYTICAL REPORT
PIT CLOSURE PROJECT - Soil

SAMPLE IDENTIFICATION

	Field ID	Lab ID
SAMPLE NUMBER:	KP 53	945191
MTR CODE SITE NAME:	93216	N/A
SAMPLE DATE TIME (Hrs):	5-16-94	1620
SAMPLED BY:	N/A	
DATE OF TPH EXT. ANAL.:	5-17-94	5/17/94
DATE OF BTEX EXT. ANAL.:	5/20/94	5/22/94
TYPE DESCRIPTION:	VC	Fine Sand & clay

REMARKS:

RESULTS

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	<0.5	MG/KG	20			
TOLUENE	3.3	MG/KG	20			
ETHYL BENZENE	4.1	MG/KG	20			
TOTAL XYLENES	48	MG/KG	20			
TOTAL BTEX	56	MG/KG				
TPH (418.1)	100	MG/KG			2.02	28
HEADSPACE PID	240	PPM				
PERCENT SOLIDS	88.9	%				

-- TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020 --

The Surrogate Recovery was at 93 % for this sample All QA/QC was acceptable.

Active:

ATI results attached.

DF = Dilution Factor Used

Approved By:

John L. Leland

Date:

7/14/94



Analytical Technologies, Inc.

GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)
CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 405378
PROJECT # : 24324
PROJECT NAME : PIT CLOSURE

SAMPLE ID. #	CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
24	945190	NON-AQ	05/16/94	05/20/94	05/22/94	1
25	945191	NON-AQ	05/16/94	05/20/94	05/22/94	20
26	945004	NON-AQ	04/22/94	05/20/94	05/22/94	10
PARAMETER			UNITS	24	25	26
BENZENE			MG/KG	<0.025	<0.5	<0.25
TOLUENE			MG/KG	<0.025	3.3	0.9
ETHYLBENZENE			MG/KG	<0.025	4.1	1.7
TOTAL XYLENES			MG/KG	<0.025	48	12
SURROGATE:						
TRIFLUOROTOLUENE (%)				98	93	89



Analytical **Technologies**, Inc.

2709-D Pan American Freeway, NE Albuquerque, NM 87107
Phone (505) 344-3777 FAX (505) 344-4413

ATI I.D. **405378**

June 2, 1994

El Paso Natural Gas Company
P.O. Box 4990
Farmington, NM 87499

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On **05/18/94**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **non-aqueous** samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

Client samples 945004 and 945007 were submitted to Analytical Technologies' Albuquerque laboratory past the recommended EPA holding time.

NOTED
8/6/94

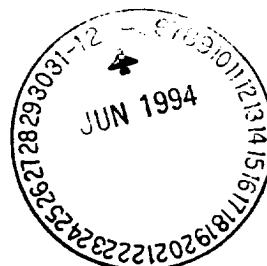
If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Letitia Krakowski, Ph.D.
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jd

Enclosure





CHAIN OF CUS, ODY RECORD

[illegible]

RECORD OF SUBSURFACE EXPLORATION

Philip Environmental Services Corp.

4000 Monroe Road

Farmington, New Mexico 87401

(505) 326-2262 FAX (505) 326-2388

Borehole #

BH-1

Well #

Page

of

1

1

Project Name

EPNG Pits

Project Number

14509

Phase

601

Project Location

W.D. Heath #3A, 93216

Well Logged By

S.Kelly

Personnel On-Site

K. Padilla, F. Rivera, D. Tsalate

Contractors On-Site

Client Personnel On-Site

Drilling Method

4 1/2" ID HSA

Air Monitoring Method

CGI, PID

Elevation

Borehole Location

GWL Depth

Logged By

S.Kelly

Drilled By

K. Padilla

Date/Time Started

6/23/95, 1200

Date/Time Completed

6/23/95, 1250

Depth (Feet)	Sample Number	Sample Interval	Sample Type & Recovery (inches)	Sample Description Classification System: USCS	USCS Symbol	Depth Lithology Change (feet)	Air Monitoring Units: NDU BZ BH			Drilling Conditions & Blow Counts
0				Backfill to 12'						
5										
10										
15	1	15-17	.95'	clayey SILT, dk. brown, non-plastic, med. dense, damp		18			257 496	1210
20	2	20-22	1.1'	SAND, light brown, fine sand, very loose, dry			0	10	288 273	1218
25	3	25-27	1.5'			26.5			245 307	1247
30	4	28-30.5	.8'	clayey SILT, SAND with 10-20% fine, sub-rounded gravel, dense.					7 429	1250
35				BOH 30.5 sandy GRAVEL appeared present in split spoon shoe at 30.5.						
40										

Comments:

Auger refusal at 28.5. No sample taken due to high headspace reading at refusal. BH grouted to surface.

Geologist Signature

Sarah Kelly